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# UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE  
 MEMORIAL HOSPITAL, INC. (doing business  
 as “Sage Memorial Hospital”); an Arizona non-  
 profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
 EXTEND TIME FOR THIRD-  
 PARTY PLAINTIFF RDC TO  
 RESPOND TO THIRD-PARTY  
 DEFENDANTS’ MOTION TO  
 DISMISS THIRD-PARTY CLAIM  
 AGAINST LEWIS BRISBOIS  
 AND STEPHEN D. HOFFMAN  
 [ECF NO. 235]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-  
 1 and subject to this Court’s approval, that Third-Party Plaintiff Razaghi Development  
 Company, LLC, (“RDC”) shall have an extension of time from February 14, 2023, up to  
 and including **March 17, 2023** (30 days) to respond to Third-Party Defendants’ Motion to  
 Dismiss RDC’s Third-Party Claim Against Lewis Brisbois and Stephen D. Hoffman (ECF

No. 235) (the “Motion to Dismiss”) filed on January 31, 2023.

The parties stipulate that there is good cause for the requested extension due to RDC’s counsels’ current case load including Mr. Uppal’s upcoming trial in another matter, RDC’s availability to assist in preparing the response, the other currently pending deadlines in this matter, and in consideration of the volume and complexity of the issues in this case, including those raised by the Motion to Dismiss. This is the first request to extend RDC’s deadline to respond to the Third-Party Defendants’ Motion to Dismiss.

This request is made in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested extension.

Third-Party Defendants Lewis Brisbois Bisgaard & Smith LLP and Stephen D. Hoffman (“Third-Party Defendants”) will be filing a motion to stay discovery with respect to RDC’s Third-Party Complaint during the pendency of the Motion to Dismiss. Nothing in this stipulation shall constitute a waiver of any issues or arguments set forth in the Motion to Dismiss or in Third-Party Defendants’ forthcoming motion to stay discovery.

For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Third-Party Plaintiff RDC up to and including **March 17, 2023** to respond to Third-Party Defendants’ Motion to Dismiss.

RESPECTFULLY SUBMITTED this 8th day of February 2023.

/s/ Joel Z. Schwarz (with permission)

Joel Z. Schwarz, Esq.

*Counsel for Third-Party Defendants*

/s/ Kris Leonhardt

Pavneet Singh Uppal, Esq.

Kris Leonhardt, Esq.

Nermana Pehlic, Esq.

Jeffrey D. Winchester, Esq.

*Counsel for Defendants,*

*Counterplaintiffs, and Third-Party*

*Plaintiffs*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: February 9, 2023